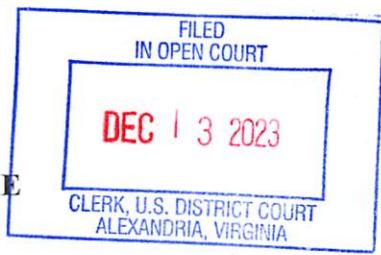


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA



Alexandria Division

UNITED STATES OF AMERICA

v.

TRENT JAMES RUSSELL,  
Defendant.

UNDER SEAL

Case No. 1:23-CR-195

Count 1: Destruction and Alteration of Records  
18 U.S.C. § 1519

Count 2: Obtaining Individually Identifiable  
Health Information  
42 U.S.C. § 1320d-6(a)(2) and (b)(1)

Count 3: Disclosing Individually Identifiable  
Health Information  
42 U.S.C. § 1320d-6(a)(3) and (b)(1)

INDICTMENT

December 2023 Term—at Alexandria, Virginia

**COUNT ONE**  
**(Destruction and Alteration of Records in Federal Investigations)**

THE GRAND JURY CHARGES THAT:

On or about February 12, 2019, within the Eastern District of Virginia, the defendant, TRENT JAMES RUSSELL, did unlawfully and knowingly alter, conceal, cover up, falsify and destroy a record, document, and tangible object, specifically, a computer hard drive and the data stored on it, with the intent to impede, obstruct, and influence the investigation and proper administration of a matter that the defendant knew and contemplated was within the jurisdiction of a department and agency of the United States, that is, the investigation into the defendant's obtaining and disclosing of VICTIM 1's individually identifiable health information.

(All in violation of Title 18, U.S. Code, Section 1519.)

**COUNT TWO**  
**(Wrongful Obtaining of Individually Identifiable Health Information)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 7, 2019, within the Eastern District of Virginia, the defendant, TRENT JAMES RUSSELL, knowingly, without authorization, and for a reason other than permitted by Title 42, United States Code, Chapter 7, Subchapter XI, Part C, obtained individually identifiable health care information related to an individual, to wit, VICTIM 1.

(All in violation of Title 42, U.S. Code, Section 1320d-6(a)(2) and (b)(1).)

**COUNT THREE**  
**(Wrongful Disclosure of Individually Identifiable Health Information)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 11, 2019, within the Eastern District of Virginia, the defendant, TRENT JAMES RUSSELL, knowingly, without authorization, and for a reason other than permitted by Title 42, United States Code, Chapter 7, Subchapter XI, Part C, disclosed and caused to be disclosed individually identifiable health care information related to an individual, to wit, VICTIM 1.

(All in violation of Title 42, U.S. Code, Section 1320d-6(a)(3) and (b)(1).)

*Pursuant to the E-Government Act,  
a true bill. This document has been filed  
under seal in the Clerk's Office.*

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FOREPERSON

Jessica D. Aber  
United States Attorney

By:   
Zoe Bedell  
Assistant United States Attorney